

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

KATHERINE ZEBROSKI

:

Civil Action

v.

:

No. 09-1857

JOHANNA GOUAK, *et al.*

:

JURY TRIAL DEMANDED

**SUPPLEMENTAL DECLARATION OF ELLIOT B. PLATT IN SUPPORT OF
PLAINTIFF'S MOTION FOR ALLOWANCE OF ATTORNEY'S FEES AND COSTS**

1. I am counsel to Katherine Zebroski, Plaintiff in this case.
2. This Declaration is in support of the Motion for Allowance of Attorney's Fees and Costs (the Motion) that I filed on behalf of Ms. Zebroski on April 11, 2011.
3. In the Motion, I itemized the following costs:

a. Filing Fee, Complaint	350.00
b. Xerox, Kaufman J. Procedures (Required to be served with Comp.)	6.75
c. Xerox, Complaint for Service	3.15
d. Service of Complaint	75.00
e. Witness Fee, F. Mayo Dep.	40.00
f. Witness Fee, F. Mayo Trial	40.00
g. Taxi to Court for Trial	7.20
h. Taxi to Office from Trial	5.00
i. Service, May Dep. Subpoena	40.00
j. Service, Mayo Trial Subpoena	40.00
k. Zebroski Dep. Subpoena	914.25
l. Xerox, Trial Exhibits	222.04
m. Xerox, Document Production	63.07
n. Gouak Deposition Transcript	937.50
o. May Deposition Transcript	622.50
p. Lauinger Deposition Transcript	735.00
q. Projection Equipment for Trial	1,130.71
r. Federal Express, Trial Exs. to G. Egan	15.95

Total	\$5,258.12
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4. Appended hereto as Exhibit A are copies of invoices for all the costs claimed except in-office xeroxing, witness fees and taxi rides.

5. I do not get separate receipts for in-office xeroxing. I charge 15 cents per page for in-office xeroxing, which is reasonable.

6. I do not have have receipts for the witness fees. They were paid by check to Francis Mayo. Forty dollars per day is the statutory witness fee.

7. I do not have receipts for the taxi rides. The amounts incurred are common and reasonable for the trip between my office and the Court.

8. In reviewing the invoices, I realized that the cost of service of subpoenas on Francis Mayo was understated. As the attached show, the costs were \$55.00 for service for Mr. Mayo's deposition and \$65.00 for service for trial. The trial subpoena had to be served as a rush because Mr. Mayo was going on vacation.

9. Adding the correct amount for serving Mr. Mayo, the total costs were \$5,298.12.

10. After reduction of the costs as set out in the Motion, the total costs claimed is \$4,780.77.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 9, 2011

s/ Elliot B. Platt
ELLIOT B. PLATT

CERTIFICATE OF SERVICE

I hereby certify that the foregoing has been filed electronically and is available for viewing and downloading from the ECF system.

Date: May 9, 2011

s/ Elliot B. Platt
ELLIOT B. PLATT
Attorney for Plaintiff